



2021-10-18

Submitted via <https://www.fcc.gov/ecfs/filings>

Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: FCC Docket No. 21-264 – Comments in Response to Notice of Proposed Rulemaking (NPRM) on Enabling State-of-the-Art Radar Sensors in 60 GHz Band, Amendment of Section 15.255 of the Commission's Rules

Dear Sir/Madam:

eleven-x Inc. is submitting this letter to support the proposals for new rules that were made by Acconeer in its comments filed in the proceeding ET Docket No. 21-264.

eleven-x Inc. plans to market its parking sensor product in the United States that will use 60 GHz pulse radar, and therefore has a strong interest in the FCC adopting rules that will allow for these radar operations.

eleven-x's SPS-X stall-based smart parking sensor integrating 60 GHz pulse radar allows customers in the U.S. to know exactly where an available space is located, reduce search times for parking, improve their customer's experience, improve parking compliance, optimize asset use and streamline operations.

The proposals made by Acconeer (Filing ID 109201878526039) on 60Ghz pulse radar technology are important to allow innovative products like the SPS-X. The 60Ghz pulse radar technology enables low power IoT devices. Features such as antennas integrated into the package allow the size and cost of IoT sensors to be minimized. It is important that considerations be made for this technology, as it would be difficult to interface, and measure conducted power on antenna-in-package devices.

It is important for the FCC to promote advances in new radar technologies by adopting rules that are flexible, consistent with the ETSI standards, and technologically neutral. This will allow eleven-x Inc and other IoT device manufacturers greater certainty in developing innovative radar technologies in a cost-effective manner. Consistent standards will allow companies like eleven-x Inc. to provide further innovative products based on 60Ghz pulse radar technology.

eleven-x.com

collaborate@eleven-x.com
t: 1.226.887.0011

311-375 Hagey Blvd.
Waterloo, ON N2L 6R5



Because of eleven-x's planned use of pulse radar technology, it is especially important that the Commission ensure that all types of radar systems are treated equally when considering the impact of proposed technical rules on their specific operations. The Commission should not inadvertently provide a competitive advantage to some parties over others by adopting rules that have varying consequences on different radar technologies.

Thank you for the opportunity to submit comments on the Notice of Proposed Rulemaking (NPRM) on Enabling State-of-the-Art Radar Sensors in 60 GHz Band, Amendment of Section 15.255 of the Commission's Rules. Please do not hesitate to contact eleven-x Inc. to provide further information

Sincerely,
eleven-x Inc.

Fraser Gibbs
CTO
fraser.gibbs@eleven-x.com